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October 19, 2022

Via ECF

Honorable Ann M. Donnelly
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York

Re: *Saada v. Golan*
Case No. 18-CV-05292


Dear Judge Donnelly:

We represent Petitioner Isacco Jacky Saada in this above referenced proceeding. Earlier this evening Ms. Golan's brother called Mr. Saada to advise him that unfortunately she had passed away. We confirmed this tragic news with Ms. King and Mr. Levy.

We are asking the Second Circuit to lift their administrative stay on Your Honor's return order and to dismiss the pending appeal. We ask that this Court be prepared to release B.A.S.'s passport to Mr. Saada as soon as practicable so that he can bring B.A.S. home. Mr. Saada plans to arrive in New York tomorrow and we ask for an order directing that B.A.S. be delivered to Mr. Saada until these proceedings can be technically unwound and they are able to return to Italy.

Finally, we request a conference call with the Court to discuss the above matters.

Respectfully Submitted,



Michael Banuchis, Esq.

cc: All counsel of record (via ECF)